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California Regional Water Quality Control Board
9174 Sky Park Court
Suite 100
San Diego, CA 92123-4340

Re: IC:13-0088.01

In response to the 1/28/05 letter from the Regional Board to SCE, a basic flaw in the approach is noted. Given a possible polluter, oversight is required in the form of experimental testing. Then of crucial importance is the fact that that possible polluter or a party hired by that polluter cannot be used to do the testing.

Independent oversight is required and any person or company connected monetarily with the polluter can never be expected to be truly independent when performing oversight testing, regardless of how honest or morally principled the tester may be.

Theoretically, the cost to the Regional Board would be identical when either the possible polluter or an independent non-affiliated entity performs the testing. My understanding is that the Regional Board has the capability for doing what's required, including acquisition of samples; this option appears to be the least costly.

Hopefully, the above remarks will have some beneficial impact on the San Onofre operations.



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SCP:sp
cc: Lyn Harris Hicks